

From: [Dan Peacock](#)
To: [Bill Jacobs](#)
Subject: Fw: Regulatory status of rodent bait stations - HR McLane inquiry from 3/20/09
Date: 03/24/2009 06:23 PM

Thank You,

Daniel B. Peacock, Biologist
Tel: 703-305-5407
Fax: 703-305-6920
E-Mail: peacock.dan@epa.gov

Addresses:

United States Postal Service (USPS): USEPA, Insecticide-Rodenticide Branch,
Registration Division (7504P), 1200 Pennsylvania Ave. NW, Washington, DC 20460-0001

Courier Deliveries: USEPA, Insecticide-Rodenticide Branch, Registration Division,
Room S-4900, One Potomac Yard, 2777 Crystal Drive, Arlington, VA 22202

----- Forwarded by Dan Peacock/DC/USEPA/US on 03/24/2009 06:23 PM -----

FW: RE: Regulatory status of rodent bait stations - HR McLane inquiry from 3/20/09

hrmclaneinc to: Dan Peacock

03/24/2009
02:56 PM

----- Forwarded Message: -----

From: "Ben Baker" <benb@jteaton.com>
To: <hrmclaneinc@bellsouth.net>
Subject: RE: Regulatory status of rodent bait stations - HR McLane inquiry from 3/20/09
Date: Tue, 24 Mar 2009 14:23:12 +0000

HR –

Thank you for clarifying EPAs position on whether unfilled bait stations need to be marked with an EPA Establishment Number. Please clarify one additional point so we can be absolutely sure we are meeting all requirements. Eaton is purchasing one bait station in particular from a manufacturer who has been including a salt pad with the stations which act

as both a salt lick for rodents, as well as an agent for repelling slugs that might eat the bait when the bait station is used outdoors. We need to know the following:

1) Does a bait stations with a salt pad fall in the category of an “empty” bait station and therefore not need to be marked with an Establishment Number?

2) If the bait station with the salt pad does not fall under the category of “empty”, what marking or registration would be required? 3) As mentioned during our phone conversation, we have discontinued selling the bait stations with the salt pads awaiting EPA’s opinion on the subject. If some sort of registration is required, please determine the proper procedure for notifying EPA that we have been inadvertently selling bait stations, manufactured by others, which contained the salt pads.

Thanks for your help.

Ben

From: hrmclaneinc@bellsouth.net [mailto:hrmclaneinc@bellsouth.net]

Sent: Tuesday, March 24, 2009 10:05 AM

To: Benb@jteaton.com

Subject: Fw: Regulatory status of rodent bait stations - HR McLane inquiry from 3/20/09

----- Forwarded Message: -----

From: Peacock.Dan@epamail.epa.gov

To: hrmclaneinc@bellsouth.net

Subject: Fw: Regulatory status of rodent bait stations - HR McLane inquiry from 3/20/09

Date: Tue, 24 Mar 2009 11:37:12 +0000

Dear Mr. McLane,

The information below should answer your questions about bait stations.

Daniel B. Peacock, Biologist

Tel: 703-305-5407

Fax: 703-305-6920
E-Mail: peacock.dan@epa.gov

Addresses:

United States Postal Service (USPS): USEPA, Insecticide-Rodenticide Branch, Registration Division (7504P), 1200 Pennsylvania Ave. NW, Washington, DC 20460-0001

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Regulatory status of rodent bait stations - HR McLane inquiry from 3/20/09

Bill Jacobs

to:

Dan Peacock

03/24/2009 07:34 AM

A rodent bait station sold empty is "pesticide application equipment". It is not a device or a pesticide. It does not have to bear an establishment number.

If a rodent bait station is sold with bait, whether loaded or not, the whole thing (bait plus station) becomes a pesticide product. In that case, the product would have to be labeled with reg. no. & est. no.

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